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February 13, 2025

File No. 54268.03

VIA ECF

Hon. Jennifer E. Willis
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

**RE: Charles v. Pinnacle Too, LLC, et al.
No. 22-CV-4232 (DEH)(JW)**

Dear Judge Willis:

We represent Defendants Pinnacle Too, LLC, Agir Electrical, LTD, and Antony Girona (the “Pinnacle Defendants”) in the above-referenced matter. Please accept this correspondence as the Pinnacle Defendants’ response to Plaintiff’s letter dated February 12, 2025. (Dkt. No. 173).

On February 12, 2025, we submitted an application to withdraw as counsel for the Pinnacle Defendants and requested that the case be stayed for 45 days so that the Pinnacle Defendants have the opportunity to obtain new counsel. (Dkt. Nos. 170-172). Plaintiff’s counsel, C.K. Lee, does not oppose such application; however, he requests that he be permitted to distribute class notices during this period. The Pinnacle Defendants’ position remains that the case should be fully stayed and no action should be taken until new counsel is obtained. If the Court grants our application for withdrawal, the Pinnacle Defendants would be prejudiced if they are unrepresented during this process and any further action would be more appropriately handled by incoming counsel. As such, Plaintiff’s request should be denied.

We are available to further discuss at March 17th conference. We thank the Court for its time and attention to this matter.

Respectfully,

/s/ Simi Bhutani

Simi Bhutani of
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: All counsel of record (via ECF)